

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

LUIS G. LARA and OLGA M. GARCIA

Plaintiffs,

v.

Case No.: 1:09cv1269 GBL/TRJ

GMAC MORTGAGE, L.L.C., *et al.*

Defendants.

NOTICE OF SUPPLEMENTAL EXHIBITS

Plaintiffs, by counsel, hereby submit additional exhibits in support of their Motion to Amend the Complaint, heard before magistrate Judge Jones on January 14, 2011, and taken under advisement.

The supplemental exhibits are as follows: Ex H - Opinion of the Massachusetts Supreme Court decided recently on January 7, 2011 (Virginia, like MA, is also a title theory state with very similar non-judicial foreclosure laws); Ex I - The Massachusetts Attorney General brief in support; Ex J - the NACA brief in support filed in that case; Ex K & L - two articles (dated Jan 16 and Jan 19, 2011) revealing that Ally Financial (GMAC) is rescinding all active Maryland foreclosures conducted pursuant to documents executed by Jeffrey Stephan, the same individual who executed documents relied on to foreclose on Plaintiffs' Property in this case.

Respectfully Submitted,

LUIS LARA & OLGA GARCIA

By Counsel,
Brown, Brown & Brown, P.C.

By: _____/s/
Christopher E. Brown
VSB#39852
6269 Franconia Road

Alexandria, Virginia 22310
703.924.0223
fax 703.924.1586
brownfirm@lawyer.com

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January, 2011, I electronically filed the foregoing using the CM/ECF system which will send notification of such filing to:

David G. Barger
Va. Bar No. 21652
Greenberg Traurig, LLP
1750 Tysons Boulevard, Suite 1200
McLean, Virginia 22102
Phone: 703.749.1307
Fax: 703.714.8307
bargerd@gtlaw.com

*Attorney for Defendants GMAC Mortgage, LLC,
MERSCORP, Inc. and Mortgage Electronic Registration Systems, Inc.*

Of Counsel:

Thomas J. Cunningham (Admitted *Pro Hac Vice*)
J. Matthew Goodin (Admitted *Pro Hac Vice*)
LOCKE LORD BISSELL & LIDDELL LLP
111 South Wacker Drive
Chicago, Illinois 60606
Phone: 312.443.0472
Fax: 312.896.6472
tcunningham@lockelord.com
mgoodin@lockelord.com

*Attorneys for Defendants GMAC Mortgage, LLC,
MERSCORP, Inc. and Mortgage Electronic Registration Systems, Inc.*

Bryan Alan Fratkin, Esq.
Jonathan Chiu, Esq.
McGuireWoods LLP
One James Center
901 East Cary St
Richmond, VA 23219
bfratkin@mcguirewoods.com
jchiu@mcguirewoods.com

Attorneys for Defendant Greenpoint Mortgage Funding, Inc.

Ronald James Guillot, Jr., Esq.
Samuel I. White PC
5040 Corporate Woods Drive Suite 120

Virginia Beach, VA 23462

rguillot@siwpc.com

Attorney for Defendant Samuel I. White, PC

/s/

Christopher E. Brown, Esq.
Virginia State Bar No. 39852
Brown, Brown & Brown, P.C.
Counsel for Plaintiffs